UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

WENDY DAVIS, DAVID GINS, and TIMOTHY HOLLOWAY,

Plaintiffs,

Civil Action No. 1:21-cv-00565-RP

v.

Hon. Robert Pitman

ELIAZAR CISNEROS, RANDI CEH, STEVE CEH, JOEYLYNN MESAROS, ROBERT MESAROS, and DOLORES PARK,

Defendants.

PLAINTIFFS' NOTICE REGARDING SUMMARY JUDGMENT ORDER

Plaintiffs Wendy Davis, David Gins, and Timothy Holloway (together, "Plaintiffs") respectfully submit this notice in response to this Court's August 5, 2024 Order denying the three motions for summary judgment from Defendants Eliazar Cisneros, Dolores Park, and Joeylynn and Robert Mesaros, Dkt. 458 (the "Order").

Plaintiffs understand that the Court filed the Order under seal because it may be subject to the parties' protective order, and accordingly requested that the parties file proposed redactions to the Order, along with written justification for any such redactions, by August 12, 2024. Plaintiffs submit this notice to confirm that they have no proposed redactions to the Order.

DATED: August 12, 2024 Respectfully submitted,

/s/ John Paredes

TEXAS CIVIL RIGHTS PROJECT

Christina M. Beeler (TX Bar No. 24096124) Sarah Xiyi Chen (CA Bar No. 325327) (*pro hac vice*)

Veronikah Rhea Warms (TX Bar No.

24132682) (pro hac vice)

Travis Fife (TX Bar No. 24126956)

Texas Civil Rights Project 1405 Montopolis Drive

Austin, TX 78741

Telephone: (512) 474-5073

Facsimile: (512) 474-0726

christinab@texascivilrightsproject.org schen@texascivilrightsproject.org veronikah@texascivilrightsproject.org travis@texascivilrightsproject.org

THE PROTECT DEMOCRACY PROJECT, INC.

John Paredes (NY Bar No. 5225412) (pro hac vice)

Orion Danjuma (NY Bar No. 4942249) (pro hac vice)

The Protect Democracy Project, Inc.

82 Nassau Street, #601

New York, NY 10038

Telephone: (202) 579-4582

Facsimile: (202) 769-3176

john.paredes@protectdemocracy.org orion.danjuma@protectdemocracy.org

Cameron O. Kistler (DC Bar No. 1008922)

(pro hac vice)

Cerin Lindgrensavage (DC Bar No.

1741602) (pro hac vice)

JoAnna Suriani (DC Bar No. 1645212) (pro hac vice)

Anne Harden Tindall (DC Bar No. 494607) (pro hac vice)

The Protect Democracy Project, Inc.

2020 Pennsylvania Ave. NW, Suite # 163

Washington, DC 20006
Telephone: (202) 579-4582
Facsimile: (202) 769-3176
cameron.kistler@protectdemocracy.org
cerin.lindgrensavage@protectdemocracy.org
joanna.suriani@protectdemocracy.org
anne.tindall@protectdemocracy.org

Benjamin L. Berwick (MA Bar No. 679207) (pro hac vice)
The Protect Democracy Project, Inc.
15 Main Street, Suite 312
Watertown, MA 02472
Telephone: (202) 579-4582
Facsimile: (202) 769-3176
ben.berwick@protectdemocracy.org

Jared Fletcher Davidson (LA Bar No. 37093) (pro hac vice)
The Protect Democracy Project, Inc. 3014 Dauphine Street, Suite J
New Orleans, LA 70117
Telephone: (202) 579-4582
Facsimile: (202) 769-3176
jared.davidson@protectdemocracy.org

WILLKIE FARR & GALLAGHER LLP

Michael Gottlieb (DC Bar No. 974960) (pro hac vice)

Robert Meyer (DC Bar No. 405632) (pro hac vice)

Samuel Hall (DC Bar No. 242110) (pro hac vice)

Meryl Conant Governski (DC Bar No.

1023549) (pro hac vice)

Jamielah Yancey (DC Bar No. 1619055)

(pro hac vice)

Rebecca Heath (DC Bar No. 1644402) (pro hac vice)

Amy R. Orlov (DC Bar No. 1780213) (pro hac vice)

Noah Mussmon (DC Bar No. 90006660) (pro hac vice)

Willkie Farr & Gallagher LLP 1875 K Street, N.W.

Washington, D.C. 20006-1238
Telephone: (202) 303-1000
Facsimile: (202) 303-2000
Email: mgottlieb@willkie.com
rmeyer@willkie.com
shall@willkie.com
mgovernski@willkie.com
jyancey@willkie.com
rheath@willkie.com
aorlov@willkie.com
nmussmon@willkie.com

Aaron E. Nathan (NY Bar No. 5478227) (pro hac vice)
Madeleine Tayer (NY Bar No. 5683545) (pro hac vice)
Christina Adele Peck (NY Bar No. 5923545) (pro hac vice)
Willkie Farr & Gallagher LLP 787 Seventh Avenue
New York, NY 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111
Email: anathan@willkie.com

mtayer@willkie.com cpeck@willkie.com

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2024, a true and correct copy of the foregoing has been served on all counsel of record and Defendants Steve Ceh and Randi Ceh by the Electronic Case File System of the Western District of Texas in compliance with the Federal Rules of Civil Procedure and by email as agreed by the parties.

DATED: August 12, 2024 Respectfully submitted,

/s/ John Paredes

John Paredes (NY Bar No. 5225412) (*pro hac vice*)
The Protect Democracy Project, Inc. 82 Nassau Street, #601
New York, NY 10038
Telephone: (202) 579-4582

Facsimile: (202) 769-3176

john.paredes@protectdemocracy.org